

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In Re: RFC and ResCap Liquidating Trust
Litigation

Court File No. 13-cv-3451 (SRN/HB)

This document relates to:

ResCap Liquidating Trust v. Primary
Residential Mortgage, Inc., No. 16-cv-
4070 (SRN/HB)

**STIPULATION TO AMEND
REVISED CASE MANAGEMENT
ORDER TO EXTEND FACT
DISCOVERY DEADLINE**

The parties hereby stipulate and jointly move the Court for an Order amending the Revised Case Management Order [Doc. No. 5035] in the above-referenced action to extend the fact discovery deadline, and hereby state and stipulate as follows:

WHEREAS, the Court issued a Revised Case Management Order (“Revised CMO”) in this action on February 28, 2019;

WHEREAS, pursuant to Section III of the Revised CMO, all fact discovery is to be completed by April 30, 2019;

WHEREAS, despite the parties’ best efforts, the parties require a limited amount of additional time to complete depositions; and

WHEREAS, the parties have agreed to a 17-day extension of the fact discovery deadline.

NOW, THEREFORE, subject to the Court’s approval, the parties stipulate that:

All fact discovery shall be completed by May 17, 2019.

Dated: April 24, 2019

SPENCER FANE LLP

By: /s/Randi J. Winter

Donald G. Heeman, #286023
Jessica J. Nelson, #347358
Randi J. Winter, #0391354
100 South Fifth Street, Suite 1900
Minneapolis, MN 55402-1267
Telephone: (612) 268-7000
Facsimile: (612) 268-7001
dheeman@spencerfane.com
jnelson@spencerfane.com
rwinter@spencerfane.com

CARPENTER LIPPS & LELAND LLP

Jeffrey A. Lipps (admitted *pro hac vice*)
Jennifer A.L. Battle (admitted *pro hac vice*)
280 Plaza, Suite 1300
280 North High Street
Columbus, Ohio 43215
Telephone: (614) 365-4100
Facsimile: (614) 365-9145
lipps@carpenterlipps.com
battle@carpenterlipps.com

QUINN EMANUEL URQUHART
& SULLIVAN, LLP

Peter E. Calamari (admitted *pro hac vice*)
Deborah K. Brown (admitted *pro hac vice*)
Isaac Nesser (admitted *pro hac vice*)
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100
petercalamari@quinnemanuel.com
deborahbrown@quinnemanuel.com
isaacnesser@quinnemanuel.com

QUINN EMANUEL URQUHART
& SULLIVAN, LLP

Anthony Alden (admitted *pro hac vice*)
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100
anthonyalden@quinnemanuel.com

Attorneys for Plaintiff ResCap Liquidating Trust

WILLIAMS & CONNOLLY LLP

By: /s/Matthew V. Johnson

Matthew V. Johnson, #0324875
Jesse T. Smallwood (admitted *pro hac*
vice)
725 Twelfth Street, N.W.
Washington, DC 20005
Telephone: (202) 434-5000
Facsimile: (202) 434-5029
mjohnson@wc.com
jsmallwood@wc.com

ZELLE LLP

Elizabeth V. Kniffen, #0346329
Rory D. Zamansky, #0330620
500 Washington Avenue South
Suite 4000
Minneapolis, MN 55415
Telephone: (612) 339-2020
Facsimile: (612) 336-9100
ekniffen@zelle.com
rzamansky@zelle.com

PRIMARY RESIDENTIAL
MORTGAGE, INC.

Darryl J. Lee (admitted *pro hac vice*)
1480 N. 2200 W.
Salt Lake City, UT 84116
Telephone: (801) 596-8707
dlee@primeres.com

Attorneys for Defendant Primary Residential Mortgage, Inc.